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WW Engineering & Science, Inc.

5555 Glenwood Hills Parkway SE • PO Box 874 • Grand Rapids, MI 49588-0874 • (616) 942-9600, Fax (616) 942-6499

September 30, 1992

Mary Beth Novy, RPM
U.S. Environmental Protection Agency
77 West Jackson Blvd., HSRW-6J
Chicago, IL 60604

RE: Albion-Sheridan Landfill QAPP and SAP

Dear Mary Beth:

Enclosed with this letter are replacement pages for the Albion-Sheridan Landfill QAPP in response to comments received from Wade Hillman (QAS) on 9/16/92 and a phone conversation between Wade and myself on 9/18/92.

This letter serves as a comment response letter for the comments and directs the reviewer to where the change was made. Additional explanations are provided, as appropriate.

Comment 1. WWES recognizes the merit in this comment and will provide such numbering in future documents. In an effort to expedite the approval process for the Albion-Sheridan Township Landfill project, we have not renumbered pages.

Comment 2. Change made to address this comment on page 1-8. I explained in the phone conversation why the figure did not have to be changed (the figure indicates "months" from Project Plan approval).

Comment 3. Changes have been made to address this comment on pages 2-1, 2-2, 2-4, and 2-5, in addition to minor modifications to Figure 5.

Comment 4. Change made to page 9-1 in accordance with what was discussed during the phone conversation.

Comment 5. Changes have been made to Table 5 to address this comment. Additionally, the term "water" applies to ground water and surface water and the term "soil" applies to sediment, soil and subsurface soil.

Comment 6. According to Jan Pels, the SAS provided in the QAPP is a boiler plate SAS from Region V. That particular SAS has been bid by the CLP in that particular form (without specifying the extension referenced). It would make no difference at this point if we added it to our SAS since the CLP already has this SAS contracted to labs within their program. Therefore, WWES has not edited that SAS.

Comment 7 Language has been added to address this comment on page 6-A of the SAP. Additionally, an "Addendum II" has been added to all SASs to accommodate this comment.

Comment 8 The phrase "whole aqueous samples" has been deleted from all SASs with the exception of the low concentration waters. For the organics SAS, this refers to including VOCs, SVOCs, and pesticides/PCBs and for the inorganics SAS, this refers to including metals, cyanide, and mercury. This notation is specifically asked in Section 2 of a SAS and this is normal procedure to include it.

Comment 9 and 10 Corrections have been made to address these comments.

Comment 11 According to Jan Pels, there are currently no high concentration contracts held through the CLP program. At this point, we have no idea what to expect in these samples. Her recommendation is to schedule these samples as medium concentration samples. If they are not oily or do not separate into phases, then we can send them as medium concentration samples. The lab can screen them immediately upon receipt and alert us as to whether they can analyze them or not. If they cannot, they will retain them until further arrangements can be made. There are no holding times for high concentration samples.

WWES concurs with Jan Pels' recommendation. WWES feels that she has the most "hands on" experience with dealing with these kinds of issues. WWES acknowledges that any analytical data reported may be qualitative in nature, however, WWES is willing to accept that risk. With your concurrence, WWES would like to approach the analysis of landfill characterization samples in this manner and move forward.

This differs from what Mr. Hillman and I spoke about, however, at the time, I did not have Jan Pels' perspective on the matter.

Given this rationale, I have left the characterization of the landfill waste samples as "medium concentration".

Comment 12 WWES has added language to address this comment beginning on page 1.7. of the QAPP.

Comment 13 Appendix C has been modified to address this comment.

Comment 14 Table 6 of the QAPP has been created to address this comment.

Comment 15 Footnotes have been added to the tables in question. As discussed on the phone, no field equipment blanks will be collected for these media. No field equipment will be used to collect either the residential well or the surface water samples. Aqueous field equipment blanks are not recommended by Region V EPA for solid media and therefore will not be collected for these media.

Comment 16 These changes have been made on the SAP tables as directed by Mr. Hillman during the conference call.

Comment 17 This change has been made to the dissolved oxygen SOP.

Comment 18 These SOPs were faxed to Mr. Hillman prior to the conference call. Changes to the SOPs requested during the conference call have been made.

WWES acknowledges the comment regarding the use of PVC as well casing, however, this is a decision that the entire project team made.

WWES is confident that we have addressed all of the comments provided in an acceptable manner. We look forward to the successful approval of the QAPP.

Sincerely yours,

WW ENGINEERING & SCIENCE, INC.
Environmental Services Division

A handwritten signature in cursive script, reading "Elizabeth M. Uhl".

Elizabeth M. Uhl
Site Project Manager

cc: 04011, 32